

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

KAREN LURIE,

Plaintiff,

v.

**GLOBE LIFE AND ACCIDENT
INSURANCE COMPANY, et al.,**

Defendant,

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Case No. 1:06-cv-0034MEF

MOTION TO COMPEL PAYMENT OF EXPERT FEES AND EXPENSES

COMES NOW the Plaintiff and hereby move the Court for an order compelling Defendant Globe Life and Accident Insurance Company to pay the fees and expenses incurred by expert Mr. John H. Allen related to the preparation and giving of his depositional testimony on the following grounds:

1). Defendant Globe noticed Mr. Allen's deposition and subsequently took the deposition on or about December 7, 2006. (Notice, Exhibit "A"); (Deposition, Exhibit "B").

2). Mr. Allen, incurred expenses and fees as a result thereof and submitted invoices for payment of said fees and expenses to Defendant Globe. (Correspondence, collectively attached, Exhibit "C").

3). To date, Defendant Globe has refused to pay the Mr. Allen's fees and expenses as required by Rule 26(b)(4)(C) of the Federal Rules of Civil Procedure.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs move the Court for an order requiring Defendant Globe to pay the fees and expenses incurred by Mr. Allen related to the preparation and giving of his above identified depositional testimony.

/s/Christopher E. Sanspree
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Attorney for the Plaintiff

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all counsel of record as listed below by placing a copy of the same in the United States Mail, first class, postage prepaid on this the **22nd** day of **March**, 2007.

s/Christopher E. Sanspree
OF COUNSEL

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